

WASHINGTON  
**UTC**  
UTILITIES AND TRANSPORTATION  
COMMISSION

**TO:** File in Docket TV-081462

**FROM:** Vicki Elliott, Policy Specialist  
Carlene Hughes, Compliance Specialist  
Penny Ingram, Regulatory Analyst

**DATE:** October 22, 2008

**SUBJECT:** Comments filed by Washington Movers Conference

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On October 15, 2008, and on October 17, 2008, Jim Tutton of the Washington Movers Conference, a member organization of the Washington Trucking Association, filed comments in Docket TV-081462. Those comments are attached.

The Movers Conference first "concurs with the clarifying language recommended for the purposes of Docket TV-081462."

Secondly, the Movers Conference provided comments about the application of Item 100, Storage, as it pertains to storage-in-transit. Commission staff Penny Ingram worked with Mr. Tutton to clarify the interpretation of storage-in-transit and to revise the proposed training materials staff will offer the industry regarding this issue.

Mr. Tutton was satisfied with the outcome of the storage-in-transit issue and agrees with the proposed changes in TV-081462.

## Elliott, Vicki (UTC)

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**Subject:** FW: Current Review of Commission Published Household Goods Tariff 15-C - Docket No. TV-081462

**From:** Jim Tutton [mailto:jim@wtassns.com]

**Sent:** Wednesday, October 15, 2008 3:05 PM

**To:** Danner, Dave (UTC); Stillwell, Suzanne (UTC); Elliott, Vicki (UTC); Ingram, Penny (UTC)

**Cc:** Wallace, Sharon (UTC); Eckhardt, Gene (UTC)

**Subject:** Current Review of Commission Published Household Goods Tariff 15-C - Docket No. TV-081462

Good Afternoon All –

Following the quarterly Washington Movers Conference Board of Directors meeting yesterday, the following comments are provided for the current review of Commission published Household Goods Tariff 15-C - Docket No. TV-081462.

The following comments relate to paragraph 6 – “*Storage-In-Transit for Shipments Moving More than 55 Miles.*”

- A. The WMC concurs with the clarifying language recommended for the purposes of Docket TV-081462.
- B. However, household goods carriers have found a flaw in the method of calculating transportation charges for mileage rated shipments going into storage-in-transit. In actuality there are **two** distinct transportation events when transporting the goods from the origin of the shipment - to storage-in-transit – from storage-in-transit to the final destination of the goods. The current Commission methodology, as shown in the “*Household Goods Rules and Tariff Training*”, dated September 4, 2008, for billing the customer based upon this type of shipment being considered one continuous move works only when the household goods carrier has a storage facility located in very close proximity to the direct route of the shipment being transported from the origin destination to the final destination as shown in your examples “*Olympia to DuPont to Tacoma, Olympia to Tacoma to Everett, and Olympia to Seattle to Everett*”. In other instances the household goods carrier is financially penalized. Lets look at the following example:

The origin of the goods weighing 3000 pounds is North Bend, WA requiring storage-in -transit.

The ultimate destination of the goods is Bellingham, WA

The customer selected household goods carrier has their nearest storage-in-transit warehouse located in Kent, WA

Highway mileage from North Bend to Kent is 32 miles rated using ITEM 201 at \$702.90 for the transportation service.

Highway mileage from the storage-in-transit warehouse in Kent to Bellingham, the ultimate destination, is 100 miles rated using ITEM 200 at \$988.20.

The total for the two legs of transportation service, including loading the truck twice and off-loading the truck twice equates to \$1,691.11

The Commission’s solution for rating this shipment, as shown on pages 27 – 29 of the “*Household Goods Rules and Tariff Training*”, equates to \$1,020.60, or \$670.51 less which is a financial penalty to the household goods carrier! There could be any number of scenarios that would result in a financial penalty to the household goods carrier.

In addition, in Tariff 15-C, ITEM 100 – Storage, paragraph 3c, it talks about “*Charges for transportation furnished, if any, for the delivery of the remainder of the shipment will be based on the net weight remaining in SIT, or calculated at hourly rates if the destination is 55 miles or less*”

*from the storage facility.*" This statement, I believe, contradicts the commission's methodology described above and is confusing to the household goods carriers.

- C. The WMC requests the Commissions methodology be readdressed particularly before the new training program starts in November 2008. The methodology should be changed to allow for two separate shipment transportation events, one into storage-in-transit and the other from storage-in-transit to the ultimate final destination. Placing a household goods shipment in storage-in-transit is a customer request, not a household goods carrier's directive.

Thank you.

Jim Tutton, Exec. Dir.  
WMC

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Have you checked out the new WTA web site at [www.wtatrucking.com](http://www.wtatrucking.com) ?

**Elliott, Vicki (UTC)**

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**Subject:** FW: SIT

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**From:** Ingram, Penny (UTC)  
**Sent:** Friday, October 17, 2008 4:42 PM  
**To:** Elliott, Vicki (UTC)  
**Subject:** FW: SIT

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**From:** Jim Tutton [mailto:jim@wtassns.com]  
**Sent:** Fri 10/17/2008 4:23 PM  
**To:** Ingram, Penny (UTC)  
**Cc:** Eckhardt, Gene (UTC); Wallace, Sharon (UTC); Stillwell, Suzanne (UTC)  
**Subject:** RE: SIT

Hi Penny –

With the one typo corrected using the right Tariff ITEM, I am in agreement. I needed to insure we were capturing all of the miles the goods are transported.

Please take a look at HHG Tariff No. 15-C, ITEM 100, 3c, the second paragraph. I think this paragraph needs some re-writing for clarity. It talks about hourly rates if the miles from the S-I-T warehouse are 55 mile or less. If we use Tariff ITEM 201 going in when the distance is 55 miles or less from origin, we should use Tariff ITEM 201 going out when the distance is 55 mile or less to the final destination when the overall shipment is rated as a mileage rated move. Right now I believe the paragraph is confusing.

Thanks for your help.

Jim Tutton, Exec. Dir.  
WMC

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